## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	<u> </u>
	§ Chapter 11
Free Speech Systems LLC	§
	<b>§</b> Case No. 22-60043 (CML)
Debtor.	§
	§

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE

PLEASE TAKE NOTICE that Richard A. Cochrane of Akin Gump Strauss Hauer & Feld LLP is appearing on behalf of Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and Marcel Fontaine (collectively, the "Texas Plaintiffs") and David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi, Carlos M. Soto, Jillian Soto-Marino, William Aldenberg, William Sherlach, and Robert Parker (collectively, the "Connecticut Plaintiffs," together with the Texas Plaintiffs, the "Sandy Hook Families"), 1 creditors and parties-in-interest in the above-captioned case, pursuant to section 1109(b) of title 11 of the United States Code (the "Bankruptcy Code") and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and respectfully requests, pursuant to Bankruptcy Rules 2002, 3017, and 9007 and Bankruptcy Code sections 342 and 1109(b), that copies of all notices given or required to be given in the above captioned cases and all papers served or required to be served in such cases be served upon the following:

<sup>&</sup>lt;sup>1</sup> Marcel Fontaine was not defamed relating to the Sandy Hook tragedy. Instead, he was defamed relating to the Parkland shooting. For ease of reference, however, all tort claimants shall be referred to as the Sandy Hook Families.

AKIN GUMP STRAUSS HAUER & FELD LLP

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PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Code section

1109(b), the foregoing request includes not only the notices and papers referred to in the

Bankruptcy Rules specified above, but also includes, without limitation, notices of any

application, complaint, demand, hearing, motion, petition, order, pleading, or other request,

whether formal or informal, whether written or oral and whether transmitted or conveyed by mail,

hand delivery, telephone, electronic mail, or otherwise, that is filed or given in connection with

the above-captioned cases.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any

subsequent appearance, pleading, claim, or suit is intended or shall be deemed or construed to be

a waiver of any substantive or procedural rights of this request shall not be deemed or construed

to be a waiver of any substantive or procedural rights of the Sandy Hook Families, including,

without limitation: (i) to have final orders in non-core matters entered only after de novo review

by the United States District Court for the Southern District of Texas (the "District Court"); (ii) to

have a trial by jury in any proceeding related to these cases or any case, controversy or proceeding

related to these cases; (iii) to have the District Court withdraw the reference in any matter subject

to mandatory or discretionary withdrawal; and (iv) any other rights, claims, actions or defenses to

which the Sandy Hook Families may be entitled in law, in equity, or otherwise, all of which rights,

claims, actions and defenses are expressly reserved.

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**PLEASE TAKE FURTHER NOTICE** that the aforementioned attorney requests that he be added to the official service list for notice of all contested matters, adversary proceedings, and other proceedings in these cases.

Dated: September 16, 2022 Respectfully Submitted,

## AKIN GUMP STRAUSS HAUER & FELD LLP

/s/ Richard A. Cochrane

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Counsel to the Sandy Hook Families

## **CERTIFICATE OF SERVICE**

I certify that on September 16, 2022, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Richard A. Cochrane

Richard A. Cochrane